

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MARK FLORA

vs.

TRANSOCEAN DRILLING  
(USA), INC., ET AL.

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CIVIL ACTION NO. 4:19-CV-2328

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: Smith Maritime, Inc.

Records Pertaining To: Mark Flora

Type of Records: Any and all accident/injury reports and medical records contained in the personnel file pertaining to Mark Flora; DOB: 08/28/1969; SSN: XXX-XX-8088

1. Please state your full name and telephone number.

Name: Elise Anderson

Phone Number: 904-284-0503

2. Please state by whom you are employed and the business address.

Employer: Smith Maritime, Inc.

Address: P.O. Box 188 / 967 Bulkhead Road / Green Cove Springs, FL 32043

3. What is the title of your position or job?

Answer: Company Financial Officer

4. Are these memoranda, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named entity, in your custody or subject to your control, supervision or direction?

Answer: Smith Maritime, Inc does not have any medical/accident records on file.

5. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: No records on file



6. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations, mentioned in Question No. 4. Have you complied? If not, why?

Answer: No records on file

7. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such memoranda, reports, records, or data compilations.

Answer: No records on file

8. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this facility?

Answer: No records on file

9. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: No records on file

10. Were the entries on these records made at or shortly after the time of the transaction recorded?

Answer: No records on file

11. What is the retention period of these types of records?

Answer: No records on file

12. Was the method of preparation of these records trustworthy?

Answer: No records on file



WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_